
United States District Court

WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

v.

RICHARD DOUGHERTY,
[DOB: 09/05/1960]

31 U.S.C. 5324(a)
NMT 10 Years Imprisonment
NMT \$500,000.00 Fine
NMT 3 Years Supervised Release
\$100 Mandatory Special Assessment
Class C Felony

CRIMINAL COMPLAINT

Case Number: 13-0055-SWH-01

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about February 16, 2012 and continuing until March 27, 2013 in Jackson County, in the Western District of Missouri, and elsewhere, the defendant RICHARD DOUGHERTY, did knowingly for the purpose of evading the reporting requirements of Title 31 United States Code, Sections 5313, and any regulation prescribed under any such section, the reporting or record keeping requirements imposed by any order issued under Title 31, United States Code, Section 5326, and the record keeping requirements imposed by any regulation prescribed under section 21 of the Federal Deposit Insurance Act or section 123 of Public Law 91-508, structured or assisted in structuring, or attempted to structure or assist in structuring or aided and abetted structuring of the following transactions with one or more domestic financial institutions, to wit: During this time period, Dougherty purchased at least \$166,380 in chips with cash in 11 structured transactions, and Dougherty cashed in chips for \$315,075 in 32 separate structured transactions (more fully outlined in the attached Affidavit), all in violation of Title 31, United States Code, Section 5324(a)(1) and (3).

I further state that I am a Special Agent of the Internal Revenue Service and that this complaint is based on the following facts:

(See attached Affidavit)

Continued on the attached sheet and made a part hereof: Yes No



Alex Churchman, Special Agent
Internal Revenue Service

Sworn to before me and subscribed in my presence,

March 28, 2013
Date

at

Kansas City, Missouri
City and State

SARAH W. HAYS
United States Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer